

Rio Mesa Solar Electric Generating Facility (RMSEGF)
(11-AFC-4)
Applicant's General Comments and Comments to Conditions of Certification
on the Preliminary Staff Assessment

HAZARDOUS MATERIALS

GENERAL COMMENTS

No general comments.

FINDINGS OF FACT

No findings of fact are listed in the PSA.

PROPOSED CONDITIONS OF CERTIFICATION

1. **Page 4.4-16, HAZ-3:** Please revise the condition language as follows to reflect that a Safety Management Plan should only be required for hazardous materials that are delivered in large quantities, not for smaller containers of materials such as totes or paints. Please revise the verification language as follows to reflect that 30 days should be sufficient time for the CPM to review the plan.

HAZ-3 The project owner shall develop and implement a Safety Management Plan for delivery of liquid hazardous materials by tanker truck. The plan shall include procedures, protective equipment requirements, training and a checklist. It shall also include a section describing all measures to be implemented to prevent mixing of incompatible hazardous materials. This plan shall be applicable during construction, commissioning, and operation of the power plant.

Verification: At least sixty (60) days prior to the delivery of any liquid hazardous material to the facility (or such time as agreed upon by the project owner and the CPM), the project owner shall provide a Safety Management Plan as described above to the CPM for review and approval.

2. **Page 4.4-16, HAZ-4:** Please remove the time frame reference from the first sentence of HAZ-4 as follows since this is already referred to in the verification.

~~**HAZ-4** At least thirty (30) days prior to commencing construction, a~~ A site-specific Construction Site Security Plan for the construction phase shall be prepared and made available to the CPM for review and approval.

3. **Page 4.4-17, HAZ-5:** Please revise Item 6(b) within the condition as well as the verification language as follows:

HAZARDOUS MATERIALS

6b. A statement(s) (refer to sample, attachment “B”) signed by the contractor or authorized representative(s) for any permanent contractors or other technical contractors (as determined by the CPM after consultation with the project owner) that are present at any time on the site to repair, maintain, investigate, or conduct any other technical duties involving critical components (as determined by the CPM after consultation with the project owner) certifying that background investigations have been conducted on contractor personnel that visit the project site. Background investigations shall be restricted to ascertaining the accuracy of employee identity and employment history, and shall be conducted in accordance with state and federal law regarding security and privacy.

Verification: At least 30 days prior to the initial receipt of hazardous materials on-site (or such time as agreed upon by the project owner and the CPM), the project owner shall notify the CPM that a site-specific Operations Site Security Plan is available for review and approval. In the Annual Compliance Report, the project owner shall include a statement that all current project employee and appropriate contractor background investigations have been performed, and updated certification statements are appended to the Operations Security Plan. In the Annual Compliance Report, the project owner shall include a statement that the Operations Security Plan includes all current hazardous materials transport vendor certifications for security plans and employee background investigations.

REFERENCES

1. Please add the following additional reference:

BS 2012v – BrightSource/t. Stewart, Applicant’s Supplemental Data Response Number Four, Set 1A (#16 and #26): “Applicant’s Environmental Enhancement Proposal” - Docket 11-AFC-04. Submitted to CEC Dockets Unit on July 23, 2012.